

BROMBERG LAW OFFICE, P.C.

Brian L. Bromberg (Admitted in NY, NJ & CA)

352 Rutland Road #1
Brooklyn, NY 11225
Phone: (212) 248-7906
Fax: (212) 248-7908

December 30, 2022

Via ECF

Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Elfe v. 26 Motors Corp., et al., 22-CV-9385 (RA)

Dear Judge Abrams:

My office, together with co-counsel, represents the plaintiff, Glenn C. Elfe, in the above-referenced auto-fraud case against Defendants 26 Motors Corp, John Doe #1 a/k/a “Kyle”, John Doe #2 a/k/a “Chino”, John Doe #3 a/k/a Manager, Wells Fargo Bank, N.A., L.J. Marchese Chevrolet, Inc., and Michelle Bailey.

I am writing to request that Your Honor adjourn the Rule 16 Conference scheduled for January 6, 2023 by 30 days and extend today’s deadline for submitting the proposed case management plan and joint letter by 30 days as well. Defendants 26 Motors Corp., Wells Fargo Bank, N.A., L.J. Marchese Chevrolet, Inc., and Michelle Bailey join in this request.

I am making this request for three reasons:

- 1) The deadline for Defendants 26 Motors Corp., Wells Fargo Bank, N.A., L.J. Marchese Chevrolet, Inc., and Michelle Bailey to answer or otherwise respond to the complaint has not yet expired and they have not yet answered;
- 2) The John Doe Defendants, “Kyle”, “Chino”, and the Manager have not signed waivers of service, so I will have to have these parties served formally; and
- 3) I have been advised by counsel for 26 Motors Corp. that John Doe #2 a/k/a “Chino” no longer works at 26 Motors Corp., so I will have to find him and have him served. I have requested Chino’s full name and last-known contact information from 26 Motors’ counsel.

Respectfully,

/s/ Brian L. Bromberg
Brian L. Bromberg

cc: David G. Murphy, Esq. (via ECF)
H. Nicholas Goodman, Esq. (Via Email: ngoodman@ngoodmanlaw.com)
Thomas R. Breeden, Esq. (Via Email: trb@tbreedenlaw.com)

Application granted. The initial conference in this matter is adjourned to February 10, 2023 at 1:30 p.m., at the same conference line listed in the Court's prior order dated November 10, 2022. The parties shall file the joint letter and proposed case management plan no later than February 3, 2023.

SO ORDERED.



Hon. Ronnie Abrams
January 3, 2023